

Please do NOT approve the current iBiquity proposal for IBOC digital service on the AM band. This comment only applies to the iBiquity IBOC system on AM, I see no problem with its use on FM.

Practical field tests of this service on AM (like those conducted by Clear Channel engineers) indicate that it has the potential to greatly increase adjacent channel interference. The test results and corresponding claims submitted by iBiquity regarding interference must not be accepted without more extensive testing.

Unlike FM, cable-delivered audio, satellite-delivered radio, etc., the AM programming we rely on is not reliant on fidelity. AM has become the last outlet for local community audio programming. This is its value to our family and to many others - local news and programming. For example, we often tune to WFAS-1230 in Westchester County, New York, for local community programs not available on our local Connecticut stations. But we live outside the protected area of WFAS. If either of the closer Connecticut stations on 1220 or 1240 should go to IBOC, we may very well lose reception of WFAS. This is just one example of the potential impact of adjacent frequency interference from the iBiquity AM IBOC digital service.

For our family's usage of AM radio, additional fidelity adds nothing. We have many sources for CD-quality audio - FM, cable, internet, XM, etc. What we need is more community-oriented programming, and we need to ensure that the interference and economics of IBOC will not drive out the few remaining stations with local programming.

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